

# EXHIBIT 19

## Memorandum of Activity

Case Number: I16A0120900	Office: JRI-5 Western (San Francisco)	Type of Activity: Interview
Date of Activity: 06/01/2021	Date Report Drafted: 06/02/2021	Location of Activity: Microsoft Teams
Subject of Activity: <b>Victim 4</b>	Activity Conducted By (Name(s)): Reggie Lee	Signature: R L

On June 1, 2021, **Victim 4** Former Skydiver, Parachute Center, Lodi, CA, was interviewed via Microsoft Teams by Special Agent Reggie Lee, U.S. Department of Transportation, Office of Inspector General, San Francisco, CA. After being advised of the identity of the interviewing agent and the nature of the interview, **Victim 4** provided the following:

**Victim 4** was at the Parachute Center for about two months from June to August of 2016. His sole purpose of the trip was to increase his jump numbers and attain the Tandem Instructor rating as it was more affordable at Parachute Center than his home drop zone in New Zealand. **Victim 4**'s partner coordinated and purchased his first jump ticket at the Parachute Center in an effort to encourage him to go.

While at the Parachute Center, there were several skydivers from around the world who were also seeking their Tandem Instructor rating. **Victim 4** was one of few English speaking skydivers in the drop zone. **Victim 4** inquired and registered for the next available Tandem Instructor course with Rob Pooley (Pooley). **Victim 4** believed he paid Pooley between \$1,000 to \$1,300 for the course which was for U.S. Parachute Association (USPA)'s Coach and Tandem Instructor ratings and United Parachute Technologies (UPT)'s Tandem Instructor rating. **Victim 4** could not recall if he paid in cash or credit card but he did not receive a receipt for the payment.

There were approximately seven candidates in the course whom were mostly skydivers that were staying at the Parachute Center. **Victim 4** could only recall a few candidates, they were Kwon (Kwon), [REDACTED] and [REDACTED]. Throughout the course, Pooley was unreliable. Some days he was there, some days he did not show up. There was no set schedule and the training was sporadic. **Victim 4** believed the course stretched anywhere from a week to three weeks. There were no other Examiners in the course.

One of the last steps in the course was to complete the paperwork. The USPA and UPT paperwork already had signatures printed on it. **Victim 4**'s understanding was that it was not Pooley's signature, rather someone else's because Pooley's Tandem Examiners ratings had been suspended. However, at the time, no one knew Pooley's ratings were suspended because Pooley did not say so. In theory, Pooley was conducting the course under someone else's name. **Victim 4** later learned the signature was that of **Y.G.**

**Y.G.** was out of the U.S. during the training and returned to the U.S. after Kwon's accident. **Y.G.** met with the candidates and told them he was trying to resolve the issue. **Victim 4** was not sure if **Y.G.** knew that Pooley was running the course using **Y.G.**'s signature.

After completing the course, several skydivers asked Pooley on the status of their paperwork. For some time, Pooley responded the paperwork was submitted and they needed to wait. As a result, most candidates believed the paperwork was being processed with USPA and UPT. There was another Tandem Instructor course just prior to Kwon's accident. **Victim 4** stated he would not have paid Pooley for the course had he known Pooley's Examiners ratings were suspended and was not permitted to teach the course.

On the morning of Kwon's accident, **Victim 4** was not skydiving due to a sore ankle. It was one of the busiest

This report is the property of the Office of Inspector General, and is For Official Use Only. It contains sensitive law enforcement information, the use and dissemination of which is subject to the Privacy Act, 5 U.S.C. § 552a. This information may not be copied or disseminated without the written permission of the OIG, which will be granted only in accordance with the Privacy Act and the Freedom of Information Act, 5 U.S.C. § 552. Any unauthorized or unofficial use or dissemination of this information will be penalized.

days at the Parachute Center. At around 10:00 a.m., Kwon and the 18-year old passenger went up on the second load of the morning. Kwon's friend [REDACTED] was asking around where Kwon was. Victim 4 recalled the 18-year old's mother trying to drive to the accident site while several skydivers tried to stop her. Everyone sort of learned of Kwon's death as the day went on. Some did not find out until much later in the day.

After Kwon's accident, skydivers continued to ask Pooley on the status of their paperwork. Pooley responded it was being processed all the while the paperwork was never sent in. Everyone began to get nervous when there was no news of their Tandem Instructor rating. Victim 4 could not recall exactly how he and the others learned that the paperwork was never sent in. They all found out much later that the paperwork was most likely sitting at Bill Dause (Dause)'s desk the entire time.

Pooley attempted to find another Tandem Examiner to run the course again. Everyone at the Parachute Center was also trying to figure out what happened to their Tandem Instructor rating. Candidates tried to get copies of their paperwork from Pooley and Dause. However, both Pooley and Dause would not provide copies of their USPA and UPT paperwork for whatever reason. Victim 4 was not sure if Dause was aware of the issue.

Pooley did not offer refunds to candidates either. Instead, he struck whatever deals he could with different candidates. Victim 4 suspected some might have received some money back. Everyone was upset and angry at Pooley. The candidates had no money and paid for a course with no ratings. Victim 4 also asked for a refund but never got his money back.

Through a friend from New Zealand, Victim 4 was able to schedule another Tandem Instructor course in Skydive Perris in Southern California. Victim 4 only had a few weeks left on his visa and had to get the Tandem Instructor rating to begin work in New Zealand. Victim 4 paid for a second time for the Tandem Instructor course. Soon after completing the second course, Victim 4 left the U.S. to New Zealand.

On June 21, 2021, Victim 4 stated he could not recall exactly which paperwork he completed at the time. However, he believed he completed USPA License Application, USPA Coach Rating Course Proficiency Card, and USPA Tandem Instructor Rating Course Proficiency Card. In addition, Victim 4 provided two photographs: a photograph with Dause at Parachute Center and screenshot of email Victim 4 received.

Attachments:

- Photograph of Victim 4 and Dause
- Screenshot of Email Victim 4 received

Reviewed By (Initials): K K Date: 06/28/2021

This report is the property of the Office of Inspector General, and is For Official Use Only. It contains sensitive law enforcement information, the use and dissemination of which is subject to the Privacy Act, 5 U.S.C. § 552a. This information may not be copied or disseminated without the written permission of the OIG, which will be granted only in accordance with the Privacy Act and the Freedom of Information Act, 5 U.S.C. § 552. Any unauthorized or unofficial use or dissemination of this information will be penalized.